

Appl. No. 09/611,920
Amdt. dated August 10, 2004
Reply to final Office action of May 20, 2004

REMARKS/ARGUMENTS

Receipt of the final Office action dated May 20, 2004 is hereby acknowledged. In that action, the Examiner rejected all the pending claims as allegedly obvious over an article titled "Using LDAP Directory Caches" authored by Sophie Cluet *et al.* (hereinafter the *Cluet* article) in view of *Luotonen* (U.S. Patent No. 5, 864,852).

With this Preliminary Amendment, Applicant adds new claims 21-44. Applicant respectfully submits that the pending claims are allowable over the art of record and respectfully requests reconsideration.

I. AMENDMENTS TO THE SPECIFICATION

With this Preliminary Amendment, Applicant amends the Specification to change the title to reflect embodiments of the invention to which the claims are directed.

II. CLAIM REJECTIONS

A. Claim 1

Claim 1 was rejected as allegedly obvious over the *Cluet* article in view of *Luotonen*. The Examiner relies on *Luotonen* "to illustrate the coupling of the proxy server and the remote server." Final Office action page 6, lines 16-17. *Luotonen* teaches that a proxy server is an intermediate server that "performs an up-to-date check from the remote origin server" if the requested document may be out of date. *Luotonen* column 1, lines 46-48. Rather than maintaining a connection to the remote server, *Luotonen* establishes a connection to perform the "up-to-date" check:

When it is desired to perform up-to-date checks, the proxy server connects to the remote server.

Luotonen column 6, lines 66-67, column 7, line 1.

Claim 1, by contrast, specifically recites, "simultaneously maintaining a first plurality of connections between the directory server and the caching daemon." Applicant's specification teaches that the connections between the directory server and the caching daemon are set up and kept in place to be used as needed in processing data requests:

Appl. No. 09/611,920
Amdt. dated August 10, 2004
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In one embodiment of the present invention, the connections established between the directory server and the caching daemon run continuously.

Specification, page 9, lines 1-4 (figure reference numbers omitted).

According to the illustrated embodiment, these connections run continuously between the caching daemon and the directory server, and awaits [sic] any data requests that are initiated by the application.

Specification, page 11, lines 11-13 (figure reference numbers omitted).

Neither the *Cluet* article nor *Luotonen*, alone or in combination, teach or fairly suggest that a plurality of connections should be simultaneously maintained between the caching daemon and the directory server. In fact, the *Cluet* article and *Luotonen* teaches away from such a system. The *Cluet* article teaches that caching should be used to reduce client server communication. *Cluet* article, Page 273. *Luotonen* teaches that "[p]roxies reduce network load." *Luotonen* column 1, lines 37-38.

Based on the foregoing, Applicant respectfully submits that claim 1, and all claims which depend from claim 1 (claims 2-5), should be allowed.

B. Claim 6

Claim 6 was rejected as allegedly obvious over the *Cluet* article in view of *Luotonen*. The Examiner relies on *Luotonen* "to illustrate the coupling of the proxy server and the remote server." Final Office action page 6, lines 16-17. *Luotonen* teaches that a proxy server is an intermediate server that "performs an up-to-date check from the remote origin server" if the requested document may be out of date. *Luotonen* column 1, lines 46-48. Rather than maintaining a connection to the remote server, *Luotonen* establishes a temporary connection to briefly perform the "up-to-date" check. *Luotonen* column 6, lines 66-67, column 7, line 1.

Claim 6, by contrast, recites, "a caching daemon maintaining a plurality of connections to the directory server." Applicant's specification teaches that connections between a directory server and a caching daemon are established and remain in place "continuously" in anticipation of data requests from

Appl. No. 09/611,920
Amdt. dated August 10, 2004
Reply to final Office action of May 20, 2004

applications. See Specification, page 9 lines 1-4, page 11 lines 11-13. Neither the *Cluet* article nor *Luotonen*, alone or in combination, teach or fairly suggest that a plurality of connections should be simultaneously maintained between the caching daemon and the directory server.

Based on the foregoing, Applicant respectfully submits that claim 6, and all claims which depend from claim 6 (claims 7-10), should be allowed.

C. Claim 11

Claim 11 was rejected as allegedly obvious over the *Cluet* article in view of *Luotonen*. The Examiner relies on *Luotonen* "to illustrate the coupling of the proxy server and the remote server." Final Office action page 6, lines 16-17. *Luotonen* teaches that a proxy server is an intermediate server that connects to a remote server to perform an "up-to-date" check when the "up-to-date" check is needed rather than maintaining a connection to the remote server. *Luotonen* column 1, lines 46-48, column 6, lines 66-67, column 7, line 1.

Claim 11, by contrast, recites, "a means for establishing a first plurality of simultaneously running connections between the directory server and a caching daemon." Applicant's specification teaches that connections between a directory server and a caching daemon are established and run "continuously" awaiting data requests from applications. See Specification, page 9 lines 1-4, page 11 lines 11-13. Neither the *Cluet* article nor *Luotonen*, alone or in combination, teach or fairly suggest that a plurality of connections should be simultaneously running between the caching daemon and the directory server.

Based on the foregoing, Applicant respectfully submits that claim 11, and all claims which depend from claim 11 (claims 12-15), should be allowed.

D. Claim 16

Claim 16 was rejected as allegedly obvious over the *Cluet* article in view of *Luotonen*. The Examiner relies on *Luotonen* "to illustrate the coupling of the proxy server and the remote server." Final Office action page 6, lines 16-17. *Luotonen* teaches that a proxy server is an intermediate server that connects to a remote server to perform "up-to-date" checks when the "up-to-date" checks are needed rather than maintaining a connection between the proxy server and the

Appl. No. 09/611,920
Amdt. dated August 10, 2004
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remote server. *Luotonen* column 1, lines 46-48, column 6, lines 66-67, column 7, line 1.

Claim 16, by contrast, recites, "A caching daemon, comprising ... a controller adapted to establish and maintain a first plurality of connections to the directory server." Applicant's specification teaches that connections between a directory server and a caching daemon are established and "run continuously" in anticipation of data requests from applications. See Specification, page 9 lines 1-4, page 11 lines 11-13. Neither the *Cluet* article nor *Luotonen*, alone or in combination, teach or fairly suggest that a plurality of connections should be maintained between the caching daemon and the directory server.

Based on the foregoing, Applicant respectfully submits that claim 16, and all claims which depend from claim 16 (claims 17-20), should be allowed.

III. NEW CLAIMS

New claims 21-44 are added to provide additional coverage for Applicant's contributions. Applicant respectfully submits that none of the cited art teaches or renders obvious these claims.

IV. CONCLUSION

Applicant respectfully requests reconsideration and allowance of the pending claims. If the Examiner feels that a telephone conference would expedite the resolution of this case, he is respectfully requested to contact the undersigned.

In the course of the foregoing discussions, Applicant may have at times referred to claim limitations in shorthand fashion, or may have focused on a particular claim element. This discussion should not be interpreted to mean that the other limitations can be ignored or dismissed. The claims must be viewed as a whole, and each limitation of the claims must be considered when determining the patentability of the claims. Moreover, it should be understood that there may be other distinctions between the claims and the related art which have yet to be raised, but which may be raised in the future.

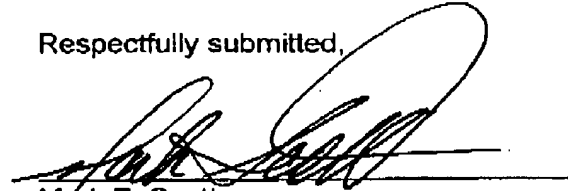
If any fees or time extensions are inadvertently omitted or if any fees have been overpaid, please appropriately charge or credit those fees to Hewlett-

Appl. No. 09/611,920
Amdt. dated August 10, 2004
Reply to final Office action of May 20, 2004

Packard Company Deposit Account Number 08-2025 and enter any time extension(s) necessary to prevent this case from being abandoned.

Applicant respectfully requests that a timely Notice of Allowance be issued in this case.

Respectfully submitted,



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